

# EXHIBIT 2

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
CASE NO.: 1:19-CV-09156 (LTS) (KHP)

- - - - - x

GRAHAM CHASE ROBINSON,

Plaintiff,

- against -

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,

Defendants.

- - - - - x

VOLUME II  
ZOOM VIDEOCONFERENCE DEPOSITION OF  
ROBERT DE NIRO  
April 5, 2022

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1 A. I don't see that.

2 Q. In the fifth paragraph.

3 A. In the fifth paragraph. Oh, yes,  
4 okay. I see it.

5 Q. Okay.

6 As of December 2018, what were the  
7 other perks that Ms. Robinson received in  
8 addition to her base salary, do you know?

9 A. I don't know. I don't remember or  
10 don't know really.

11 Q. All right.

12 And in late 2018, can you describe  
13 for me all the expenses that Ms. Robinson was  
14 authorized to charge to Canal?

15 A. No, I can't. I don't remember  
16 really.

17 Q. Okay. All right.

18 You testified yesterday that Canal  
19 has never had written policies, correct?

20 MR. DROGIN: Objection to form.

21 A. What?

22 MR. DROGIN: You can answer.

23 BY MR. SANFORD:

24 Q. You testified yesterday, did you  
25 not, that Canal has never had written policies,

1 correct?

2 A. Yes. I guess I did, yes.

3 Q. And that's true, correct?

4 A. Yes.

5 Q. Okay.

6 You generally had conversations with  
7 employees concerning expenses orally rather than  
8 in writing?

9 A. Right.

10 Q. Is that right?

11 A. Yes.

12 Q. And do you remember during  
13 Ms. Robinson's employment what Canal's practices  
14 were concerning employee expenses?

15 A. No, I don't know those specifics.

16 Q. Do you remember during  
17 Ms. Robinson's employment what Canal's standard  
18 operating procedure was with respect to employee  
19 reimbursements?

20 A. No. Oh, I mean I would know if  
21 something was spent and charged to me where it  
22 shouldn't be. Of course, I would.

23 Q. And how would you know if something  
24 was charged to you that shouldn't be?

25 A. Well, it would be brought to my

1 what was being done by, by her, Chase.

2 BY MR. SANFORD:

3 Q. During Ms. Robinson's employment, if  
4 an employee was working through dinner, Canal  
5 would pay for that dinner, right?

6 A. Can you repeat that?

7 Q. Sure.

8 During Ms. Robinson's employment, if  
9 an employee was working through dinner, Canal  
10 would pay for that dinner, right?

11 A. It would seem that that would be  
12 what should be done, of course.

13 Q. And did you place any limits on meal  
14 expenses Canal paid for its employees?

15 A. I left that up to Chase and common  
16 sense by everybody.

17 Q. And during the period of 2008 to  
18 2019, as far as you were aware, what other food  
19 or drink expenses would Canal pay for on behalf  
20 of its employees?

21 A. I can't -- I don't really have an  
22 answer. I don't know.

23 Q. During the period of 2008 to 2019,  
24 there were various circumstances where Canal  
25 would pay for employees to take taxis and Ubers

1 and Lyfts, correct?

2 A. I don't even know that. But again,  
3 that was up to her. So, I again say it was up  
4 to her to do what was right, ethical, and it is  
5 that simple.

6 Q. What were the circumstances when  
7 Canal would pay for employees to take taxis,  
8 Ubers or Lyfts?

9 A. It would only be if it was at night  
10 or some time which is not normal work hours.  
11 That's what I would expect, you know. Again,  
12 common sense.

13 Q. Did you ever say that to anybody?

14 A. They knew that's how I felt, and I  
15 had said it, I know it, from time to time to  
16 Chase.

17 Q. Who did you tell?

18 A. I said it to her.

19 Q. And Chase would apply those  
20 guidelines to her assistants and the employees  
21 at Canal?

22 MR. DROGIN: Objection to the  
23 form.

24 THE WITNESS: I'm sorry.

25 MR. DROGIN: Objection to the

1 form.

2 You can answer. Go ahead.

3 A. I relied on her judgment about those  
4 things.

5 BY MR. SANFORD:

6 Q. Do you remember any conversation?

7 A. No, not specifically.

8 Q. Describe for me what you told  
9 Ms. Robinson over the years about what expenses  
10 she was generally authorized to be reimbursed  
11 for Canal.

12 Do you remember any conversation?

13 A. It is not like I had any -- she knew  
14 and I didn't have to go into detail. It was  
15 common sense.

16 If she brought something to my  
17 attention about it, I would say, "Well, you  
18 know, use your best judgment about that. But  
19 let's not, let's not waste -- let's not  
20 overindulge and, you know, use common sense.  
21 Period. I rely on you to do that."

22 Q. Ms. Robinson was authorized to  
23 charge more types of expenses to Canal than your  
24 other executive assistants were, correct?

25 MR. DROGIN: Objection to the

1 was working, correct?

2 MR. DROGIN: Objection to the  
3 form.

4 You can answer.

5 A. Yes, I don't know. I don't know. I  
6 can't even answer. I expected that she worked  
7 that out with my business people as to what  
8 would be appropriate.

9 And if there was something that was  
10 inappropriate or something was flagged, they  
11 would make me aware of it or I expected her  
12 before that to make me aware of it.

13 BY MR. SANFORD:

14 Q. Ms. Robinson was generally  
15 authorized to charge dinners to Canal while she  
16 was working; isn't that right?

17 MR. DROGIN: Objection to the  
18 form.

19 A. Again, it is common sense. If  
20 you're working, you could charge for dinner, of  
21 course.

22 BY MR. SANFORD:

23 Q. And your business people never  
24 flagged a concern about Ms. Robinson's meal  
25 expenses prior to her resignation; isn't that



1 right?

2 A. I can't remember. I don't know.

3 Q. Do you recall what you, what you  
4 authorized Ms. Robinson to charge Canal for  
5 regarding meals and coffees?

6 A. Say that again.

7 MR. SANFORD: Strike that. It  
8 was a poorly phrased question. Let me  
9 strike that.

10 BY MR. SANFORD:

11 Q. Do you recall conversations you had  
12 with Ms. Robinson over the years about the  
13 circumstances when she was authorized to charge  
14 Canal for her meals and coffees?

15 A. Well, like I said, everything I just  
16 said about common sense and so on. And if  
17 there's something, she can deal with my  
18 accountants or my lawyer -- one of my lawyers on  
19 it.

20 Q. Well, you know that Ms. Robinson  
21 often used taxis and Ubers in connection with  
22 work for you, correct?

23 MR. DROGIN: Objection.

24 Objection to the form.

25 Go ahead.

1           A.     I was aware of it.

2     BY MR. SANFORD:

3           Q.     And you can say for certain, or  
4     can't you say for certain, that any of the taxi  
5     and Uber charges that appeared on the Canal  
6     American Express under Ms. Robinson's name were  
7     not made in connection with work Ms. Robinson  
8     was doing for you?

9                     MR. DROGIN:   Same objection to  
10                    the form.

11                   Go ahead.

12           A.     Well, I later learned that she was  
13     charging Ubers while she was in London to me. I  
14     don't know, even in LA. That was not something  
15     she ever brought up and asked my approval for.

16                   She also had rented a car when she  
17     was in LA, but also using Ubers, I was told.  
18     That was not appropriate. That was not right.  
19     That was not ethical. Period.

20     BY MR. SANFORD:

21           Q.     Well, let me, let me break down what  
22     you just said for a second here.

23                   When you say that Ms. Robinson was  
24     in LA and had rented a car, this is a work trip  
25     in LA, correct, you're referring to?

1 Q. I'm going to get into all of that, I  
2 promise you.

3 A. Well, be my guest.

4 Q. We're going to spend a lot of time  
5 together, Mr. De Niro.

6 A. Good.

7 Q. We're just getting started.

8 But I'm asking you right now with  
9 respect to taxis and Ubers and Lyfts, whether  
10 you looked at any line item at any time on any  
11 credit card and asked yourself was she doing  
12 work for me.

13 Did you ever do that?

14 A. I don't look at line items. Excuse  
15 me. Again, it goes back to trust. I don't  
16 nitpick and go over every day. After everything  
17 she did with me, what cab did she take? What  
18 did she do? What did she spend?

19 I don't do that. My accountants do  
20 that.

21 Q. So you never satisfied yourself that  
22 she did anything improper by looking at any line  
23 item?

24 A. The satisfaction is feeling that I  
25 can trust her. If she has broken the trust, it

1                   You don't dispute that Canal credit  
2 card under Ms. Robinson's name was on file at  
3 Paola's, right?

4                   A.    No, no, I don't.

5                   Q.    And at times, meals that you had at  
6 Paola's were charged to the Canal credit card  
7 under Ms. Robinson's name; isn't that right?

8                   A.    When I would ask her to get  
9 something to have it delivered to the house or  
10 something like that. Normally I paid for it  
11 with my own credit card when I go there, which  
12 was most of the time.

13                   I didn't order take-out that much  
14 from there, but I did at times.

15                   MR. SANFORD: All right.

16                   Let's take a look at ROBINSON  
17 5720, and this is exhibit -- what's the  
18 next exhibit here, 126.

19                   (Document bearing Bates  
20 stamp Nos. ROBINSON 5720 was marked  
21 as Plaintiff's Exhibit 126 for  
22 identification, as of this date.)

23                   MR. SANFORD: And let's go off  
24 the record.

25                   THE VIDEOGRAPHER: The time is

1           A.    No, but you're saying I paid for  
2   them for meals that I had.

3           Q.    Well, we have already established  
4   that.

5           A.    Now you're going to say she did work  
6   and therefore she charged these meals to her.

7           Q.    Right.

8           A.    That's fine. I never authorized  
9   those. She never -- if she asked me, I might  
10  have said yes.

11                  But I don't even see what those  
12  meals are. She might have had friends, for all  
13  I know. Let me see what the amount is. Let me  
14  see who it is for.

15           Q.    All right.

16                  At times Ms. Robinson would pick up  
17  food and supplies for you from Whole Foods,  
18  right?

19           A.    I think from time to time, yes.

20           Q.    And at times Ms. Robinson would pick  
21  up food for you from Dean & DeLuca, right?

22           A.    I'm not so sure about Dean & DeLuca  
23  unless I just forgot.

24           Q.    Ms. Robinson was authorized to  
25  charge working meals from Whole Foods to the

1 years.

2 You haven't done that, have you?

3 A. No, I haven't. But what are you  
4 saying? What are you saying for Chase Robinson?  
5 I don't understand what the point of all this  
6 is.

7 Q. Are you saying you need to review  
8 each individual charge in detail to ascertain  
9 whether -- let me finish.

10 Mr. De Niro, you're doing that thing  
11 again.

12 A. Oh, go ahead.

13 Q. You're doing that thing again. I'm  
14 going to ask you to be respectful of the court  
15 reporter.

16 MR. DROGIN: Well, in fairness,  
17 you're both talking over each other.

18 MR. SANFORD: Well, I was in the  
19 middle of talking and he interrupted me.

20 A. Okay. You finish and I will say  
21 what I have to say.

22 BY MR. SANFORD:

23 Q. Is it your testimony, sir, that you  
24 need to review each individual charge in detail  
25 to ascertain whether the charge was proper or

1     improper?

2             A.     Well, now that you --

3                     MR. DROGIN:   Objection.

4                     Objection to the form.

5             A.     Now that you have brought it up in  
6     this way, yes, I would want to see because I  
7     don't know what the point of showing me this.

8                     It is my phone number, my name, me.  
9     That could be anybody.   It is not even Chase  
10    Robinson.   I don't know -- there's not even a  
11    credit card.   There's nothing.   So I don't know  
12    what the point is.

13    BY MR. SANFORD:

14             Q.     Can I get your commitment that  
15    sometime over the course of the next days  
16    between now and the next deposition we're going  
17    to have together, you'll review all the charges  
18    and come prepared to answer questions?

19             A.     I'll tell you this, my accountants  
20    --

21                     MR. DROGIN:   Hold on.   Hold on.  
22                     Stop.   Stop.   He's not going to direct  
23                     what you're going to do after the  
24                     deposition.

25                     MR. SANFORD:   I didn't direct

1 anything. I asked him a question.

2 MR. DROGIN: You're asking for  
3 his commitment. You're not going to get  
4 his commitment because he's going to  
5 confer with counsel.

6 BY MR. SANFORD:

7 Q. Well, Mr. De Niro, I'm just asking  
8 you whether it is something you would be willing  
9 to do, look at the charges and then come  
10 prepared to answer questions about the charges  
11 at the next deposition?

12 A. Yes, absolutely. You know what I  
13 would do is my accountants would look at them  
14 and they would pick out the ones that are  
15 questionable or -- not even questionable; that  
16 they want an answer from me about.

17 And I would say, "Okay, that's okay.  
18 That I don't understand. Why is this there?  
19 That maybe."

20 That I'm entitled to, right, since  
21 you're bringing the subject up in the first  
22 place, like she did something.

23 All you're saying -- yes, we know  
24 she paid for things for me. That we know. But  
25 now we want to see what she paid for or did she



1 Q. All right.

2 [REDACTED] is your former romantic  
3 partner and the mother of your twins, right?

4 A. Yes.

5 Q. Can you describe for me all the work  
6 that Ms. Robinson performed to assist [REDACTED]  
7 in 2018 and 2019?

8 A. No, I can't describe all that. She  
9 did certain things and then it just sort of  
10 didn't continue anymore.

11 Q. Do you remember what those certain  
12 things were? Do you remember any of them?

13 A. [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 Q. [REDACTED]

18 [REDACTED]

19 A. [REDACTED]

20 Q. And Ms. Robinson [REDACTED]

21 [REDACTED], is that what your testimony is?

22 A. In some way. I don't know the  
23 details. That was a vague thing. I just said  
24 see if you can help in this way. I think with  
25 Robin Chambers too.

1 after she returned to New York City?

2 A. I don't.

3 Q. Ms. Robinson generally arranged her  
4 travel around your schedule, didn't she?

5 A. Pretty much, except when she wanted  
6 to go to Spain or England or something like  
7 that, you know.

8 Q. I'm sorry?

9 A. Kidding. I'm joking. I'm half  
10 joking.

11 Q. Well, she generally arranged her  
12 travel around your schedule, right?

13 A. That's -- that should have been what  
14 it is, what the situation is.

15 Q. That's, in fact, what it was,  
16 correct?

17 A. I, I -- yes, I guess.

18 Q. Ms. Robinson at times had to change  
19 or cancel her trips due to your schedule, right?

20 A. That could be, yes.

21 Q. Ms. Robinson had a general practice  
22 of keeping you informed of her travel plans;  
23 isn't that fair to say?

24 A. She had to, yes, of course.

25 Q. And at times Canal would pay for its

1 employees' air travel by using SkyMiles --

2 A. Yes.

3 Q. -- generally provided by corporate  
4 credit cards, correct?

5 A. Right.

6 Q. Do you remember which employees' air  
7 travel that Canal would pay for using SkyMiles?

8 A. No, I don't, other than Robinson's.  
9 I don't know who else.

10 Q. But Robinson for sure, yes?

11 A. Yes.

12 Q. You didn't generally use SkyMiles to  
13 book your own flights, right?

14 A. Well, I might have even had to use  
15 it once or twice. I don't know. I don't  
16 remember.

17 Q. But you didn't generally use  
18 SkyMiles to book flights for you or your family,  
19 right?

20 A. No.

21 Q. When you say no, you mean it is  
22 correct what I'm saying?

23 A. Yes.

24 Q. Okay.

25 And it was common for you to charter

1 during her employment when it came to using the  
2 SkyMiles?

3 A. Well, once she asked me if she could  
4 --

5 MR. DROGIN: Objection to the  
6 form.

7 Go ahead.

8 A. One time she asked me if she could  
9 put some mileage on. She said "Can I just tack  
10 some miles on for me when I need them?" I said  
11 "Yes, well, whatever you need". And then, lo  
12 and behold I see later and before she quit, she  
13 tacked on a couple million miles to her account.  
14 So can she explain that?

15 BY MR. SANFORD:

16 Q. Beginning in 2015, you gave Ms.  
17 Robinson use of the SkyMiles for personal travel  
18 as a perk of her position at Canal; didn't you?

19 A. I don't remember that, no.

20 Q. It could have happened, you just  
21 don't remember?

22 A. I don't care. That's maybe what she  
23 told you. I don't remember it.

24 Q. You don't remember it one way or  
25 another, correct?

1 answer.

2 Q. All right.

3 During Ms. Robinson's employment --

4 MR. DROGIN: Counsel, if you  
5 don't want the would have, could have,  
6 should have, please don't ask him  
7 anymore about what happens if she  
8 testifies at trial.

9 I agree with you it is  
10 inappropriate.

11 BY MR. SANFORD:

12 Q. During Ms. Robinson's employment,  
13 Mr. Tasch never raised any concerns to you about  
14 Ms. Robinson's use of SkyMiles, did he?

15 A. I don't remember, but he was  
16 definitely on -- I don't know if you could say  
17 on point, but he never conveyed this to me, but  
18 I knew, because he knew what she was doing --  
19 constantly trying to question everything, even  
20 him, Berdon, everybody. So...

21 Q. You never placed any limit on the  
22 amount of reward points or miles Ms. Robinson  
23 could use?

24 A. That's not for me to do. I don't  
25 know a million miles from two million miles,

1     though I know three or four million miles is too  
2     much. She is stealing. She is taking which she  
3     did. So what are we talking about?

4             Q.     You never placed any limit on where  
5     Ms. Robinson could travel by using Canal reward  
6     points --

7             A.     No, no, I would. She's not going to  
8     travel to China or to some other part on the  
9     other side of the world or Australia and I need  
10    to know why and then I need to know how many air  
11    miles will be used in that.

12            Q.     And did you ever communicate any  
13    restriction to Ms. Robinson on her use of Canal  
14    reward points?

15            A.     I didn't have to communicate --

16            Q.     You're doing that thing. You're  
17    doing that thing again.

18            A.     Okay. No, no. This case -- no pun  
19    intended.

20            Q.     Mr. De Niro, we have to just get a  
21    clean record.

22                    So my question is: You never  
23    communicated any limits on where Ms. Robinson  
24    could travel using Canal's reward points or  
25    miles, did you?

1           A.     I never --

2                     MR. DROGIN:  Objection to form.

3           A.     I never, I never communicated that  
4     because I trusted her.  So, but she had to tell  
5     me if she was intending to go say to Australia,  
6     are you going for business for me or are you  
7     going to look for a hotel.  If that was the  
8     case, if I was doing a movie there, which I  
9     wasn't, or are you going there for own private  
10    thing.

11                    Then you say well, can I use the air  
12    miles.  How many air miles is that and what does  
13    it cost me because I want my kids to be able to  
14    use them.  Well, it would be this.  Well, that's  
15    dipping into my kids' things.  So I you better  
16    just -- well, I think you can take part and  
17    that's it.

18                    No, we would and could negotiate  
19    like that.  So I trusted her, though, but she  
20    knew she had to tell me where she's going,  
21    what's she is doing.  I'm sorry, she might have  
22    thought she could just do whatever she wanted.  
23    But she damn well couldn't and Michael Tasch was  
24    going to be the backup for that.  The back stop,  
25    as he should have been and should be.

1 speaking objection and there are a  
2 couple on the record because they're  
3 appropriate.

4 You are mischaracterizing what  
5 the witness is saying in search of a  
6 sound bite.

7 MR. SANFORD: Do you know the  
8 purpose of the federal rule about  
9 objections and form? The purpose of the  
10 rule is to prevent exactly what you're  
11 doing now.

12 THE WITNESS: I don't know who  
13 you're talking to.

14 MR. SANFORD: No, I was talking  
15 to your counsel who was misbehaving.

16 THE WITNESS: Are you saying that  
17 my counsel --

18 MR. DROGIN: We can show the  
19 transcript to the court and the court  
20 will decide.

21 BY MR. SANFORD:

22 Q. Mr. De Niro, you expected Ms.  
23 Robinson to keep you informed of her travel  
24 plans, right?

25 A. That's the least she could have done



1 and should have done.

2 Q. And she needed to tell you when and  
3 where she would be traveling, right?

4 A. Yes, she did.

5 Q. In fact, Ms. Robinson did keep you  
6 informed of her travel plans; didn't she?

7 A. As far as I recall, she did.

8 Q. And other than expecting Ms.  
9 Robinson to keep you informed of her upcoming  
10 travel plans, you didn't place any specific  
11 restrictions on Ms. Robinson's transferring  
12 SkyMiles, right?

13 MR. DROGIN: Objection to the  
14 form.

15 A. No, I told her -- let me explain to  
16 you. I told her, she said "I would like to put  
17 some of them on to mine. She said I need them.  
18 I said okay. I trust you. You do what you  
19 think is right". That's how I left it. What  
20 does that mean? That she can abuse it, no.

21 BY MR. SANFORD:

22 Q. Prior to Ms. Robinson's resignation,  
23 you approved a trip Ms. Robinson planned to take  
24 to LA in 2019, right?

25 A. What was the trip for?

1 Q. 2019.

2 A. What time of year?

3 Q. I don't know the specific date. It  
4 was in 2019.

5 A. You don't know that? You've got to  
6 know that.

7 Q. I don't know it offhand. I'll get  
8 it for you after we take a break, but I'm  
9 telling you I don't know right now.

10 A. All right.

11 Q. Do you remember, do you remember,  
12 though, that trip though that she took to  
13 Scotland apparently in --

14 A. I'll know -- I'll remember it  
15 better, if I remember it at all, if you give me  
16 the date when she went and it was tied into when  
17 I had to go to England then for this Warburton  
18 thing and another thing I did in Europe. I  
19 think it was going to the Moroccan Film  
20 Festival, I think.

21 Q. And Ms. Robinson was authorized to  
22 use Canal SkyMiles for that trip, wasn't she?

23 A. I'm not sure.

24 Q. Prior to Ms. Robinson's resignation,  
25 you approved multiple trips that Ms. Robinson

1 planned to take to London in 2019, right?

2 A. I don't know if I -- I don't see  
3 myself approving multiple trips. You mean she  
4 went multiple times?

5 Q. There were plans to go more than  
6 once to London in 2019, do you remember that?

7 A. And what happened, did she go?

8 Q. You don't remember is the answer?

9 A. I don't remember. You could tell me  
10 and I can tell you whether I remember it or not.

11 Q. And, therefore, you don't remember  
12 whether she was authorized to use Canal SkyMiles  
13 for the trip to London?

14 MR. DROGIN: Objection to the  
15 form.

16 A. I guess I'm going to have to say I  
17 don't remember.

18 MR. SANFORD: All right.

19 Let's take a break. Back in five  
20 minutes.

21 THE WITNESS: Okay.

22 THE VIDEOGRAPHER: The time is  
23 1:06. We're going off the record.

24 (Whereupon, at 1:06 o'clock  
25 p.m., a recess was taken until 1:22

1 Q. Right. I understand. I understand.  
2 I'm just trying to get a simple question, simple  
3 answers.

4 As long as Ms. Robinson got her work  
5 done, you did not care if she put on the TV  
6 during the day, yes or no?

7 MR. DROGIN: Objection to the  
8 form.

9 You can answer.

10 A. No, I don't, I don't even know how  
11 to answer that question.

12 BY MR. SANFORD:

13 Q. The main thing was Ms. Robinson had  
14 work to do and you wanted her to do it, right?

15 A. Yes.

16 Q. Whether she had Beethoven's 9th  
17 Symphony in the background or Netflix in the  
18 background, you really didn't care as long as  
19 she got her work done, right?

20 MR. DROGIN: Objection to the  
21 form.

22 You can answer.

23 A. Yes.

24 BY MR. SANFORD:

25 Q. Is that a "yes"?

1 A. Yes.

2 Q. And then Tiffany responds, Tiffany  
3 Chen responds "Tom will get her".

4 Do you see that?

5 A. Yes.

6 Q. All right. All right.

7 It is fair to say that you were  
8 upset that Ms. Robinson was threatening legal  
9 action, right?

10 MR. DROGIN: Objection to the  
11 form.

12 A. Yes.

13 BY MR. SANFORD:

14 Q. I'm sorry, your answer is?

15 A. Yes.

16 Q. And fair to say, too, that you  
17 considered Ms. Robinson's legal claims to be  
18 disloyal, is that fair?

19 MR. DROGIN: Objection to the  
20 form.

21 A. Yes, I mean, I don't -- I guess  
22 she's threatening legal action if she does not  
23 get a response by the 12th. I don't know what  
24 that was sent before. What letter was sent?  
25 Was it that I had to sign that thing that she

1 A. No, I don't remember that.

2 MR. DROGIN: Objection to the  
3 form. Objection to the form.

4 Go ahead.

5 A. No, I don't remember that, no.

6 BY MR. SANFORD:

7 Q. You don't remember that?

8 A. No.

9 Q. It could have happened, you just  
10 don't remember?

11 MR. DROGIN: Objection to the  
12 form.

13 A. I don't remember. I was, you  
14 know -- I was -- that's it.

15 BY MR. SANFORD:

16 Q. You reviewed correspondence from Ms.  
17 Robinson's lawyers asserting claims of  
18 discrimination, retaliation and wage and hour  
19 violations, didn't you?

20 MR. DROGIN: Objection to form.

21 A. I don't even know that I saw that.  
22 I was just very angry about what the game she is  
23 playing. What she has done. The whole thing.  
24 And I'm ready to go after her. I have no reason  
25 to wait.

1 BY MR. SANFORD:

2 Q. Okay.

3 And you wanted to go after her,  
4 right?

5 A. Of course I wanted to. I wanted her  
6 to return the stuff. Do what's right. She  
7 handled it all in the wrong way and, you know,  
8 she is sneaky. I don't want to even call names.  
9 The whole thing is so sad and pathetic that I  
10 don't know, you know.

11 Q. You are the person who decided to  
12 file a lawsuit against Ms. Robinson, right?

13 A. Yes, I guess so, yes.

14 Q. And did you review the lawsuit that  
15 you decided to file against Ms. Robinson before  
16 it was filed?

17 A. I was aware basically what it was,  
18 the gist of it.

19 Q. What does that mean?

20 A. I was aware of the gist of it.

21 Q. Answer my question.

22 My question was: Did you review it,  
23 did you read the lawsuit before it was filed?

24 MR. DROGIN: Objection to the  
25 form.

1           A.    I don't know if I read it. I don't  
2   know if I read it. I just say okay. Go after  
3   her. Period.

4   BY MR. SANFORD:

5           Q.    You said go after her, file whatever  
6   you want to file?

7           A.    Yes.

8                   MR. DROGIN: Objection to the  
9           form.

10                   That's not what the witness said.

11   BY MR. SANFORD:

12           Q.    Did you review any documentary  
13   evidence before Canal filed a lawsuit against  
14   Ms. Robinson?

15           A.    I was aware of things she had done,  
16   yes.

17           Q.    Why did you decide to seek millions  
18   of dollars in damages against Ms. Robinson?

19                   MR. DROGIN: Objection to the  
20           form.

21                   And I note that there was a  
22           30(b)(6) witness that has already been  
23           questioned about this and that --

24                   MR. SANFORD: I know, but I'm  
25           asking this witness who decided to file



1 away. We let this thing just die and I'll be  
2 very happy.

3 Q. Do you think you have destroyed her  
4 life?

5 A. I have not destroyed her life. She  
6 destroyed her own life, if she destroyed it.

7 Q. You think she destroyed her own life  
8 and you had nothing to do with it?

9 A. She has to cop to what she did. She  
10 has to, you know, maybe ask for forgiveness from  
11 people because she has done things that you just  
12 don't do. She's very unprofessional. I tried  
13 to be as lenient as I could. I tried to do the  
14 right thing. It is very simple. The honor  
15 system. I trust you. I assume that everything  
16 you're going to do is for the right reasons.  
17 I'm sorry, that's the way I am.

18 Q. You think Ms. Robinson stole \$6  
19 million from you?

20 A. No, she didn't steal \$6 million.

21 Q. Why are you asking for 6 million?

22 MR. DROGIN: Objection to the  
23 form.

24 A. They had a reason. I mean, that's  
25 something -- whatever. But they had a reason

1 and maybe it is a reason because in order to  
2 even get what we get now or what we're doing. I  
3 don't know.

4 BY MR. SANFORD:

5 Q. You don't think she stole \$5  
6 million, do you?

7 A. No, no.

8 Q. No.

9 And you don't think she stole \$4  
10 million, do you?

11 A. No.

12 Q. You don't think she stole \$3  
13 million, do you?

14 A. Well, no.

15 Q. You don't think she stole \$2  
16 million, do you?

17 A. Well, I'm not sure.

18 Q. You're not sure.

19 You think she might have stolen \$2  
20 million?

21 A. I don't know what she did. She took  
22 certain things and that number obviously is for  
23 a reason.

24 Q. You think there's a reason, you  
25 think there's a good reason for \$6 million,

1 really?

2 A. Let me, let me, yes, I will look in  
3 it.

4 Q. You look into it. I would ask you  
5 to look into that one.

6 Do you think she stole more than \$1  
7 million from you?

8 A. She could have, I guess.

9 MR. DROGIN: Can you just clarify  
10 in these numbers you're counting the  
11 cash that she already returned and the  
12 gift cards that she already returned?  
13 It is just not clear.

14 MR. SANFORD: I know you like to  
15 do the speaking thing, Mr. Drogin, but  
16 again, it is against the rules and it is  
17 against our stipulation. So I would ask  
18 you not to do that.

19 I'm asking the witness questions  
20 and he's giving answers. He's giving  
21 answers to the best of his ability, I  
22 believe.

23 BY MR. SANFORD:

24 Q. Mr. De Niro, do you think Ms.  
25 Robinson should be ordered to pay back any of

1 the salary that you paid her over the years?

2 MR. DROGIN: Objection to the  
3 form.

4 A. No.

5 BY MR. SANFORD:

6 Q. Okay. All right.

7 MR. SANFORD: Let's take a  
8 five-minute break.

9 Off the record.

10 THE WITNESS: Okay.

11 THE VIDEOGRAPHER: The time is  
12 2:20. We are going off the record.

13 (Whereupon, at 2:20 o'clock  
14 p.m., a recess was taken until 2:26  
15 o'clock p.m.)

16 THE VIDEOGRAPHER: The time is  
17 2:26. We are back on record.

18 BY MR. SANFORD:

19 Q. All right.

20 Mr. De Niro, you know you're still  
21 under oath?

22 A. Yes.

23 Q. Who is Dan Harvey?

24 A. He's my trainer.

25 Q. And can you describe the types of

## ERRATA SHEET

	PAGE	LINE#	CHANGE	REASON
1				
2				
3				
4	<u>91</u>	<u>1</u>	insert "would" after "they"	Clarification
5	<u>132</u>	<u>8</u>	Change "allusion" to "illusion"	Transcription error
6	<u>189</u>	<u>3</u>	change "mr." to "ms."	Transcription error
7	<u>214</u>	<u>7</u>	insert "and" before "Hackett"	Clarification
8	<u>229</u>	<u>18</u>	Change "principal" to "principle"	Incorrect word
9	<u>339</u>	<u>16</u>	Change "phone number" to "credit card number"	Clarification
10	<u>342</u>	<u>8</u>	Change "phone number" to "credit card number"	Clarification
11	<u>352</u>	<u>24</u>	Change "Montague" to "Montage"	Transcription error
12	<u>353</u>	<u>1</u>	Change "Montague" to "Montage"	Transcription error
13	<u>386</u>	<u>20</u>	Change to "That <del>she</del> she can abuse it? No."	Transcription error
14	<u>420</u>	<u>2</u>	insert "her" instead of "the"	Transcription error
15	<u>422</u>	<u>11</u>	insert "was" before "just"	Clarification
16	<u>427</u>	<u>17</u>	insert "say" after "can"	Clarification
17	<u>224</u>	<u>1</u>	Change "Samuel Hevn"	Correction of
18			to "Sandy O'Heaven"	name
19				
20				
21				
22				
23				
24				
25				



1 SIGNATURE PAGE  
2 OF  
3 ROBERT DE NIRO  
4

5 I hereby acknowledge that I have read the  
6 foregoing deposition, dated April 5, 2022, and  
7 that the same is a true and correct transcription  
8 of the answers given by me to the questions  
9 propounded, except for the changes, if any, noted  
10 on the attached errata sheet.

11  
12 SIGNATURE: 

13  
14 WITNESSED BY: 

15  
16 DATE: 

17  
18 THOMAS A. HARVEY  
Notary Public, State of New York  
No. 02HA6051878  
19 Qualified in Westchester County  
Commission Expires December 4, 2022  
20  
21  
22  
23  
24  
25

MAGNA 